

United States District Court

SOUTHERN

DISTRICT OF
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

Jesus Angel Mares

PRINCIPAL

YOB: 1991

United States

CRIMINAL COMPLAINT

Case Number:

M-16-1729-M

United States District Court
Southern District of Texas
FILED

SEP 16 2016

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 14, 2016 in Starr County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Moises Mendoza-Moreno, citizen and national of Mexico, who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said alien in furtherance of such violation of law within the United States, that is, from a location near Roma, Texas to the point of arrest near Roma, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On September 14, 2016, Aerostat operators advised surrounding Border Patrol Agents of 4 individuals who were running away from the Rio Grande River and loading into a white Dodge Durango at the intersection of Cox and Nix Street in Roma, Texas. Responding agents observed the Durango traveling north crossing Highway 83 and attempted to stop the vehicle. As agent attempted to stop the Durango, the driver turned around driving back to Cox Street. The Durango eventually came to a stop on Estrella Street, one street north of Cox Street, with the driver and four (4) occupants absconding. Agents observed a male subject exit the vehicle, later identified Jesus Mares, and run away from the scene. After a brief search for the five (5) subjects, agents asked the home owner of the home where the vehicle was found abandoned if they could search the premises. Consent was given and the individuals were found hiding a laundry room adjacent to the home.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

approved by
AUSTIN K. J. [Signature]

[Signature]
Signature of Complainant

Sworn to before me and subscribed in my presence,

Julio Pena Senior Patrol Agent
Printed Name of Complainant

September 16, 2016
Date

at McAllen, Texas
City and State

Dorina Ramos U. S. Magistrate Judge
Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-16- -M

RE: Jesus Angel Mares

CONTINUATION:

All subjects were taken into custody and transported to the Rio Grande City Border Patrol station for processing.

PRINCIPAL STATEMENT:

Jesus Angel MARES, was read his Miranda Rights, stated he understood his rights and was willing to provide a sworn statement without the presence of an attorney.

Jesus Angel MARES, United States Citizens, told agents he was hired to pick up group of illegal aliens by a man who he knows as Willie. MARES was to be paid \$100 USD per person transported. He stated he was traveling with his cousin, Freddie Joe Galan, to pick up the group illegal aliens. MARES stated he and Galan were to drive the illegal aliens to Escobares, Texas and was TO receive further instruction by phone.

MATERIAL WITNESS STATEMENT:

Moises MENDOZA-Moreno was read his Miranda Rights, stated he understood his rights and was willing to provide a sworn statement without the presence of an attorney.

Moises MENDOZA-Moreno, a citizen and national of Mexico, was to pay \$4,000 dollars to be smuggled into the United States to Houston, Texas. After crossing into United States, MENDOZA-Moreno told agents one of the two foot guides told the group to run to a white truck which was waiting for them. MENDOZA-Moreno stated that once the group loaded into the truck, they were told by the driver to lay down. MENDOZA-Moreno also stated that the driver only drove for a short time before Border Patrol arrived and the group jumped out of the truck and ran. MENDOZA-Moreno was able to identify, through a photo lineup, Jesus Angel Mares as the driver of the white truck he traveled in.